UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

JANE DOES 1-9,

Case No.: 7:20-cv-00947-DCC

Plaintiffs,

VS.

COLLINS MURPHY, SHARON HAMMONDS, BRENDA F. WATKINS, LIMESTONE UNIVERSITY, MG FREESITES, LTD., d/b/a PORNHUB.COM, MG FREESITES II LTD., MINDGEEK S.A.R.L., MINDGEEK USA, INC., MG BILLING LTD., and HAMMY MEDIA, LTD. d/b/a XHAMSTER.COM, TRAFFICSTARS LTD., WISEBITS LTD, XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD,

EXTENSION OF TIME TO FILE A RESPONSE

CONSENT MOTION FOR

Defendants.

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the Plaintiffs may file a response to Defendants' Motion to Dismiss. (See Dkt. No.241).

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. Upon conferring, counsel for the Defendant consents to allow Plaintiffs to extend the time to file a their Response by an additional thirty (30) days. Plaintiffs' current due date is December 6, 2022, and the new due date would be January 6, 2023.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a

full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

WHEREFORE, the Plaintiffs, respectfully requests this Court grant Plaintiffs' Motion and enter an order extending the time in which he may file a Response by an additional thirty (30) days making the new deadline to file January 6,2023.

HAVING SEEN AND AGREED:

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280) Joshua M. W. Salley (#13214) BELL LEGAL GROUP, LLC 219 North Ridge Street Georgetown, SC 29440 Telephone: (843) 546-2408 jeb@edbelllaw.com jsalley@edbelllaw.com Counsel for Plaintiffs

Tyler S. Thompson (admitted *Pro Hac Vice*)
Liz J. Shepherd (admitted *Pro Hac Vice*)
Jordan A. Stanton (admitted *Pro Hac Vice*)
DOLT, THOMPSON, SHEPHERD & CONWAY, PSC
13800 Lake Point Circle
Louisville, KY 40223
Telephone: (502) 244-7772
tthompson@kytrial.com
lshepherd@kytrial.com
jstanton@kytrial.com *Counsel for Plaintiffs*

Metcalfe & Atkinson, LLC

/s/ Hannah Rogers Metcalfe
Hannah Rogers Metcalfe, Fed ID. 9943
Metcalfe & Atkinson, LLC
1395 South Church Street
Greenville, South Carolina 29605
Attorneys for Defendant Hammy Media LTD

CIAMPA FRAY-WITZER, LLP

Evan Fray-Witzer (pro hac vice) CIAMPA FRAY-WITZER, LLP 20 Park Plaza, Suite 505 Boston, Massachusetts 02116 Telephone: 617-426-0000 Facsimile: 617-423-4855

Facsimile: 617-423-4853 Evan@CFWLegal.com

Attorneys for Defendant Hammy Media LTD

BOSTON LAW GROUP, PC

Valentin D. Gurvits (pro hac vice ow) Frank Scardino (pro hac vice) BOSTON LAW GROUP, PC 825 Beacon Street, Suite 20 Newton Centre, Massachusetts 02459

Telephone: 617-928-1804 Facsimile: 617-928-1802 vgurvits@bostonlawgroup.com frank@bostonlawgroup.com

Attorneys for Defendant Hammy Media LTD

November 30, 2022 Georgetown, SC